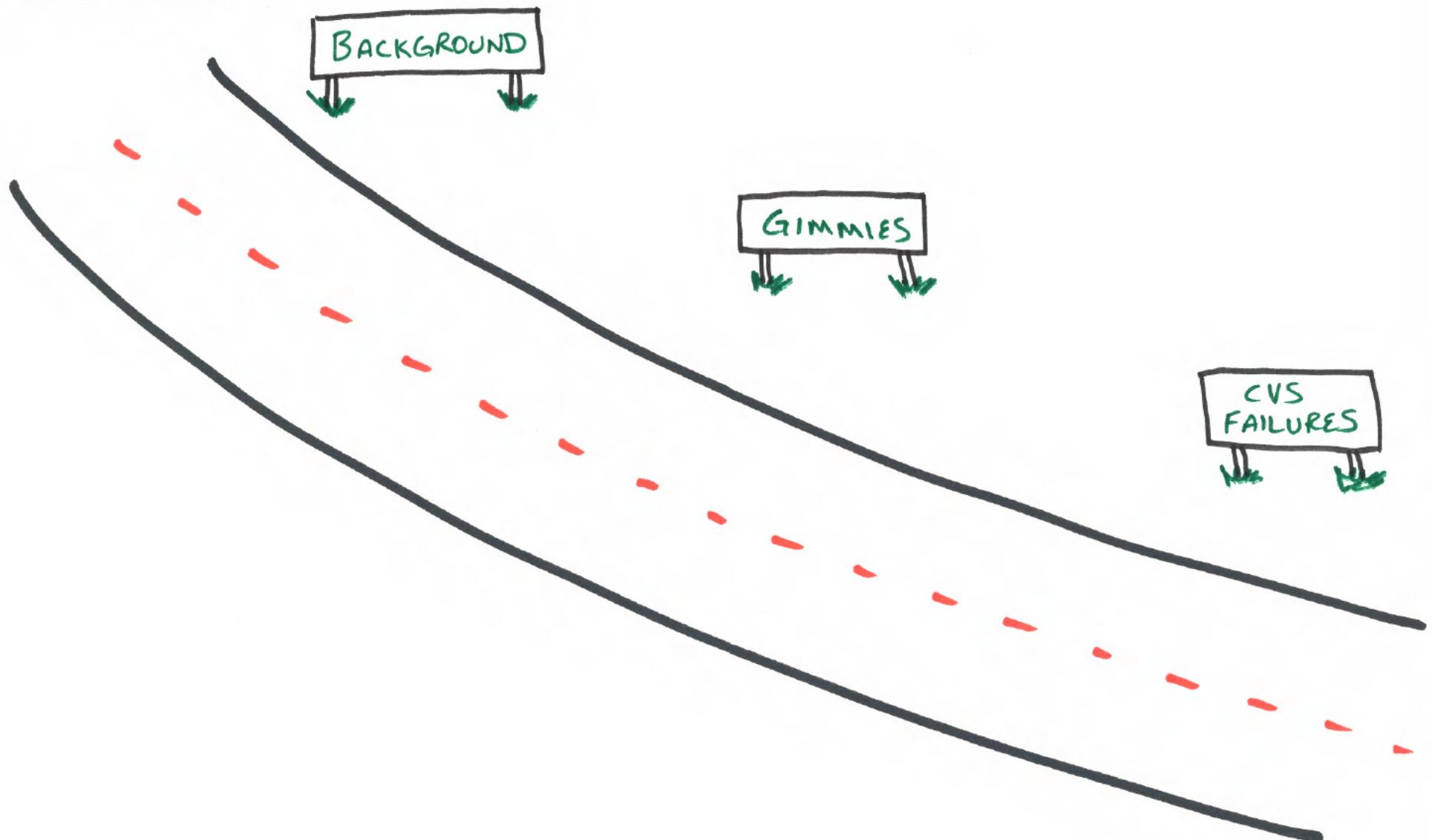


# **EXHIBIT A**



Nicole Harrington





Nicole Harrington

## BACKGROUND

### RESPONSIBILITIES

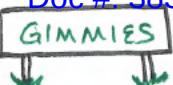
- EDUCATE OTHERS re:  
"REGULATORY COMPLIANCE ISSUES"
- PRESENTATIONS  
"influential in negotiating  
reduced civil penalties and  
mitigating extensive compliance  
agreements" *TRUE  
OR  
FALSE*
- PRIMARILY RESPONSIBLE FOR  
MITIGATING REGULATORY RISK  
in critical parts of CVS's  
pharmacy business

### EXPERIENCE "LIFER"

- +27 YEARS AT CVS
- 1994 Graduate pharm. school
- 2012 DIRECTOR OF PHARMACY  
PROFESSIONAL PRACTICE STANDARDS  
- A NEW DEPT. & POSITION
- 2016 SENIOR DIR. of PHARMACY  
Professional Services



Nicole Harrington



### THE OPIOID EPIDEMIC

- You repeatedly post on the "opioid epidemic" <sup>CVS</sup>
- Your group makes presentations on the "opioid epidemic" <sup>N. Harrington doesn't understand it.</sup>
- Epidemics don't happen overnight <sup>N. Harrington doesn't understand it.</sup>
- Specifically REGARDING OPIOIDS

### "CORRESPONDING RESPONSIBILITY"

- THIS IS A KEY PHRASE FOR OPIOID DISPENSERS
- PHARMACISTS ARE THE LAST LINE OF DEFENSE BETWEEN **ILLEGITIMATE** PRESCRIPTIONS AND OUR COMMUNITY <sup>N. Harrington "NO"</sup>
- Document draft says yes  
Training material says yes  
N. Harrington says yes 2016

### RED FLAGS

- FLAG A PHARMACIST **MUST** IDENTIFY IF THE OPIOID PRESCRIPTION HAS BEEN ISSUED FOR A LEGITIMATE PURPOSE <sup>Doc tells "all pharmacists" TRUE</sup> <sup>N. Harrington → Disagree</sup>
- FLAG REFUSE TO FILL A PRESCRIPTION WHICH HAS **RED FLAGS** PRESENT THAT CANNOT BE RESOLVED <sup>AGREED</sup>
- FLAG ALL CONTROLLED SUBSTANCE PRESCRIPTIONS MUST BE REVIEWED FOR THE PRESENCE OF **RED FLAGS** <sup>AGREED</sup>
- FLAG ALL **RED FLAGS** MUST BE RESOLVED & DOCUMENTED PRIOR TO FILLING THE PRESCRIPTION <sup>AGREED</sup>
- FLAG IF ANY **RED FLAGS** ARE UNABLE TO BE RESOLVED, A PHARMACIST **MUST** REFUSE TO FILL THE PRESCRIPTION <sup>Agreed</sup>

### TOOLS

- Training TRUE: <sup>CVS</sup> Co. training  
School training  
Personal training
- PMP's "Prescription Monitoring Program"  
STATE DATABASE w/ Rx fulfillment info.
- Many more





Nicole Harrington

## CVS & PURDUE



WERE HAND-IN-HAND  
ON OPIOID ISSUES  
AS EARLY AS 2001

BE READY AT TRIAL  
PLEASE

## CVS FAILURES

IT WOULD BE NAIVE TO THINK THAT  
CVS DID ALL IT COULD TO REDUCE THE  
GROWTH OF THIS TRAGIC PROBLEM  
N. Harrington disagrees

### CVS GOT CAUGHT REPEATEDLY

- 2010-15 Florida failure
- 2012 Holiday case
- 2011-13 Oklahoma case
- 2012-14 Texas case
- 2013-15 Mass. case
- 2010-15 Rhode Island
- 2013-15 Texas case
- 2008-12-16 Maryland case
- 2011-16 Mass. case
- 2016 Conn. case
- 2017 California case
- 2018 Alabama case
- 2018 N.Y. case
- 2019 Rhode Island case

### FAILURE BEHAVIORS

- TILL 2012 Incentive plans based on pills including opioids
- TILL 2013 "Wait time" calculations included opiates